

**LEMON GROVE SANITATION DISTRICT
AGENDA ITEM SUMMARY**

Item No. 3
Mtg. Date December 6, 2016
Dept. Public Works

Item Title: **Letter of Support to Renew the City of San Diego's Variance Request
Tentative Order No. R9-2017-0007**

Staff Contact: Mike James, Assistant City Manager / Public Works Director

Recommendation:

Approve the letter of support (**Attachment B**) and direct staff to submit the letter to the United States Environmental Protection Agency, Region IX.

Item Summary:

On November 1, 2016, District staff received a press release (**Attachment A**) issued by the United States Environmental Protective Agency (EPA) regarding the City of San Diego's variance request to renew its variance from the secondary treatment requirements contained in section 301(b)(1)(B) of the Clean Water Act for the E. W. Blom Point Loma Metropolitan Wastewater Treatment Plant and Ocean Outfall.

District staff prepared this agenda item to express support for the variance request and for the City of San Diego's Pure Water program as outlined in the variance request submitted to the EPA in January of 2015. The letter was prepared with Boardmember Jones' signature because he is currently the Board's designated representative to the Metro Commission / Metro Wastewater Joint Powers Authority.

Staff recommends that the Sanitation District Board approve the letter of support (**Attachment B**) and direct staff to submit the letter to the EPA, Region IX prior to the public comment period ending on December 21, 2016.

Fiscal Impact:

None.

Environmental Review:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Not subject to review | <input type="checkbox"/> Negative Declaration |
| <input type="checkbox"/> Categorical Exemption, Section [] | <input type="checkbox"/> Mitigated Negative Declaration |

Public Information:

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> None | <input type="checkbox"/> Newsletter article | <input type="checkbox"/> Notice to property owners within 300 ft. |
| <input type="checkbox"/> Notice published in local newspaper | <input type="checkbox"/> Neighborhood meeting | |

Attachments:

- A. Press Release
- B. Letter of Support

U.S. EPA and California Propose Permit to Reduce San Diego Wastewater Discharges to the Ocean

Advanced treatment to reduce discharges, provide sustainable water source

SAN DIEGO - Today, the U.S. Environmental Protection Agency and the San Diego Regional Water Quality Control Board proposed a City of San Diego wastewater discharge permit to increase ocean water quality protection and water reuse. The proposed permit for the City's Point Loma Wastewater Treatment Plant would ensure that all federal and state water quality standards are met.

In 2014, the City and environmental organizations signed an agreement for the City to implement a potable water reuse plan. Known as Pure Water San Diego, this plan would eventually divert up to 83 million gallons of Point Loma wastewater per day from ocean discharges to an advanced water purification facility. Once built, the facility would send highly purified water to augment local drinking water reservoirs or other reuse projects.

"San Diego has made a commitment to reduce pollutant discharges through its ocean outfall," said Alexis Strauss, EPA's Acting Regional Administrator for the Pacific Southwest. "Today's proposal furthers EPA and the State's longstanding priority of taking action to protect Southern California's coastal waters."

"Building on previous work by the city, U.S. EPA and the San Diego Water Board, this permit and the Pure Water Program measures it includes represent a major step forward in protecting the health of our coastal waters while also increasing our community's drought resilience," said David Gibson, executive officer for the San Diego Water Board. "In terms of its development with the community, its goals, and specific requirements, this permit is a model for an outcome-based regulatory approach in California and the nation."

The Regional Water Board jointly issues National Pollutant Discharge Elimination System permits with EPA to ensure that all applicable water quality standards are met in federal and state waters. The proposed permit maintains requirements to meet water quality standards for the next five years and includes elements of the Pure Water San Diego program to reduce ocean discharges and increase water reuse.

Attachment A

During the past decade, flows and pollutant discharges from the Point Loma plant have decreased steadily. Sediment discharges, for example, declined 25%. Over the next 5 years, the new permit requires the City to complete the planning, design, and environmental review for the infrastructure to implement its Pure Water reuse project. Construction of advanced water treatment facilities will enable the City to begin reusing highly treated wastewater within 10 years.

The City of San Diego must apply for a permit renewal every five years and is required to meet secondary treatment levels. EPA may grant a modification of these standards for ocean discharges if federal and state water quality standards are met. The Point Loma plant has been operating under such a modification since 1995, consistently meeting or exceeding federal and state discharge requirements.

For the next 60 days, the agencies are seeking public comment on the draft permit, including EPA's tentative decision to continue waiving secondary wastewater treatment requirements for the City, based upon the plant's current performance and commitments to implement advanced treatment and water reuse.

The Pure Water San Diego program reflects an integrated water planning approach supported by EPA, the State of California, and members of the local community, businesses, and citizen groups. Under the program, the City will invest in an advanced water purification facility to turn wastewater into a resource that helps meet the water supply needs of the region, reduces the need for imported water, and helps address ocean water quality by reducing discharges.

To comment on the draft National Pollutant Discharge Elimination System permit, visit: <https://www.epa.gov/region9/water/npdes/pubnotices.html>

For more information on EPA Region 9's tentative decision on the Clean Water Act 301(h) waiver, visit: <https://www.epa.gov/region9/water/npdes/permits.html>

For more information on the San Diego Regional Water Quality Control Board's draft NPDES permit, visit: <http://www.waterboards.ca.gov/sandiego/>

Attachment B



LEMON GROVE SANITATION DISTRICT City Manager's Department

December 6, 2016

United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

SUBJECT: Letter of Support to Renew the City of San Diego's Variance Request
Tentative Order No. R9-2017-0007

Dear Mr. Strauss:

I am writing this letter to you in full support of the City of San Diego's request to renew its variance from the secondary treatment requirements contained in section 301(b)(1)(B) of the Clean Water Act for the E. W. Blom Point Loma Metropolitan Wastewater Treatment Plant and Ocean Outfall.

I represent the Lemon Grove Sanitation District (District) on the Metro Commission / Metro Wastewater Joint Powers Authority (JPA). The JPA is a forward-looking coalition of municipalities and special districts that share in the use of the City of San Diego's regional wastewater system.

For the past several years I have been integrally involved in the JPA's partnership with the City of San Diego. I am excited to hear you issued a tentative decision to continue waiving secondary wastewater treatment requirements for the City based upon the plant's current performance and commitments to implement advanced treatment and water reuse (Pure Water). I too believe that the Pure Water program as outlined in the variance request application submitted in January 2015 will be extremely valuable to the region and to the State.

If you have any questions regarding this letter of support, please contact me any time at (619) 825-3819.

Sincerely,

Jerry Jones, Board Member
Lemon Grove Sanitation District

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